

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

UNITED STATES OF AMERICA)
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)
)
V.) **CASE NO: 1:06-CR-124-WHA**
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)
)
ROBERT REYNOLDS)

UNOPPOSED MOTION TO CONTINUE SENTENCING

COMES NOW the Defendant, Robert Reynolds (“Mr. Reynolds”), by undersigned counsel, Christine A. Freeman, and respectfully moves that the sentencing hearing, now set in this matter for April 19, 2007, be continued to a date after May 30, 2007.

In support of this motion, the Defendant would show the following:

1. Mr. Reynolds has been diagnosed with lymphoma and begins chemotherapy for this disease on April 16.
2. Mr. Reynolds is scheduled for additional chemotherapy treatments through May 14, 2007.
3. Counsel for the prosecution has authorized undersigned counsel to state that the prosecution does not oppose this motion.
4. Mr. Reynolds is under the care of Dr. Brown of Dothan, Alabama, 334-793-4804; Dr. Brown is out of his office until April 16, but his office has indicated additional information may be provided on or after that date, if necessary.

WHEREFORE, defendant respectfully requests that this Motion be granted.

Respectfully submitted,

s/Christine A. Freeman
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CERTIFICATE OF SERVICE

I hereby certify that on April 12, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:
Susan Redmond, Esq., Assistant United States Attorneys, One Court Square, Montgomery, AL 36104.

s/Christine A. Freeman
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